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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

CERTIFICATE OF NO OBJECTION

TO THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), the undersigned counsel for the above-captioned debtors and debtors-in-possession (the “Debtors”) hereby certifies as follows:

1. On October 2, 2023, the Debtors filed the *First and Final Application of Randall J. Newsome, Court-Appointed Mediator, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Incurred from May 1, 2023 through August 29, 2023 (the “Mediator Fee Application”), ECF No. 770.

2. Objections or responses to the Mediator Fee Application were due no later than October 17, 2023 at 4:00 PM prevailing Eastern Time (the “Objection Deadline”). Local Rule 9075-2 provides that the motion or application may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the attorney for the entity that filed the motion or application complies with such rule.

3. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, no responsive pleading to the Mediator Fee Application has been (a) filed with the Court on the docket of the above-captioned Chapter 11 Cases or (b) served on the Debtors or their counsel.

4. Accordingly, the Debtors respectfully request entry of the proposed order granting the relief requested in the Mediator Fee Application, attached hereto as **Exhibit A** at the Court’s earliest convenience.

5. If not entered prior to the hearing, the Debtors will seek entry of the order at the hearing (the “Hearing”) scheduled for 11:00 a.m., prevailing Eastern Time, on October 24, 2023 before the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York. The Hearing will be conducted only via Zoom.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 20, 2023
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

/s/ Sean A. O'Neal

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Exhibit A

Mediator Fee Application Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER GRANTING APPLICATION OF MEDIATOR AND
AWARDING COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR**

Upon consideration of the *First and Final Application of Randall J. Newsome, Court-Appointed Mediator, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from May 1, 2023 through August 29, 2023* filed contemporaneously herewith (the “Application”)² for professional services rendered and expenses incurred during the period commencing May 1, 2023 through August 29, 2023; and a hearing having been held before this court to consider the Application; and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

² Capitalized term used but not defined herein shall have the meaning ascribed to them in the Application.

ORDERED that the Application is granted and the Debtors are authorized to pay the Mediator \$57,000 for payment of fees incurred and \$9,593.09 for reimbursement of expenses.

Dated: October __, 2023
White Plains, New York

UNITED STATES BANKRUPTCY JUDGE
SOUTHERN DISTRICT OF NEW YORK